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 6
                                UNITED STATES DISTRICT COURT
 7
                                      DISTRICT OF NEVADA
                                                  * * *
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     JULIE HANNA,
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                                                   Case No.: 2:21-cv-00639-JCM-BNW
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                                     Plaintiff,
                                                   Stipulation and Order to Extend Deadline for
     VS.
                                                   Response and Reply to Defendants Mark
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                                                   Broadhurst's and Chase Swanson's Motions to
                                                   Dismiss (ECF No. 60 + 61)
     K-KEL, INC.. a Nevada Corporation; DOES I-
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     X; ROE Business Entities I-X; Mark
                                                   [First Request]
     Broadhurst; Mike York; and Chase Swanson,
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                                     Defendants.
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Pursuant to Local Rule 6-1, Defendant K-Kel, Inc. ("Defendant") and Plaintiff Julie Danou Hanna ("Plaintiff"), by and through their undersigned counsel, hereby stipulate to a fourteen (14) day extension of Plaintiff's deadline to file an Opposition to Defendants Mark Broadhurst's and Chase Swanson's Motions to Dismiss (ECF No. 60 + 61) and Defendants' deadline to file a Reply to Plaintiff's Opposition, as follows:

	Old Deadline	New Deadline
Plaintiff's Opposition Deadline	March 21, 2022	April 4, 2022
Defendant's Reply Deadline	March 28, 2022	April 11, 2022

This is the first request for an extension of these deadlines. The requested extension is sought in good faith and not for purposes of undue delay.

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## **GOOD CAUSE FOR EXTENSION OF DEADLINES**

This extension is necessitated to accommodate the heavy litigation schedule faced by Plaintiff's counsel over the next few weeks. Additionally, the Parties are currently engaged in settlement discussions and believe additional time is necessary to fully explore settlement before additional attorney's fees are incurred in this litigation.

Respectfully submitted,

DATED <u>3/15/2022</u>

/s/ Kathryn Back
Kathryn Black, Esquire
Pro Hac Vice Admission

Attorney for Plaintiff

\_/s/ Allison Kheel\_ Allison Kheel, Esquire Nevada Bar No. 12986 Attorney for Defendant

## **ORDER**

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

Dated: March 17, 2022